

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
LUIS J. VAZQUEZ URQUIA
SSN xxx-xx-4006

Debtor
MIDFIRST BANK
Movant
vs.
LUIS J. VAZQUEZ URQUIA
Respondent
ROBERTO ROMAN VALENTIN
Chapter 7 Trustee

BANKRUPTCY 18-07310 BKT
CHAPTER 12

MOVANT MIDFIRST BANK & DEBTOR HAVE AGREED TO A MODIFICATION OF
STAY TO INITIATE MODIFICATION OF MORTGAGE

TO THE HONORABLE COURT:

COMES NOW debtor through his new legal representation respectfully prays and requests relief as follows:

1. Debtor agrees to the modification of the §362 automatic stay in order to be able to initiate a modification of his mortgage.
2. Midfirst Bank and Debtor have agreed to a modification of the automatic stay to these effects exclusively.
3. Counsel for Midfirst has authorized debtor's counsel to move for the accepted and agreed modification of the stay and thereby avoid the hearing scheduled for December 17, 2019 before this Court.
4. Under the circumstances Debtor requests this Court to enter an Order modifying the §362 automatic stay to the only effects of initiating the modification process in hopes that the admitted default can be cured through modification.

WHEREFORE, debtor requests, as per agreement by the parties:

- a) That the §362 automatic stay be modified to the only effects of initiating and concluding the modification of the mortgage;
- b) Entry of an Order referring this case to mediation/modification;

In Caguas, Puerto Rico, this November 27, 2019

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires other

CERTIFICATE OF SERVICE: I hereby certify that I electronically filed the foregoing with the Clerk of the Court on this same date using the CM/ECF System which will send notification of such filing to all registered parties, and to the C7 Trustee.

DATED: November 27, 2019

s/ L.A. Morales

LYSSETTE MORALES VIDAL
USDC PR #121100

L.A. MORALES & ASSOCIATES P.S.C. URB
URB VILLA BLANCA
CAGUAS, PUERTO RICO 00725-1908
TEL: 746-2434 eFAX: 855-298-2515
E-MAIL: lamoraleslawoffice@gmail.com